

REMARKS

I. Introduction

Claims 6 to 15 have been added. Claims 1 to 15 are pending in the present application. In view of the foregoing amendments and the following remarks, it is respectfully submitted that the presently pending claims are allowable, and reconsideration is respectfully requested.

Applicant notes with appreciation the acknowledgment of the claim for foreign priority and the indication that all of the certified copies of the priority documents have been received.

Applicant thanks the Examiner for considering the previously filed Information Disclosure Statement, PTO-1449 paper and cited references.

As an initial matter, Applicant notes that the present application has been accorded a filing date of September 21, 2001. However, Applicant submitted a "Statement Under 35 U.S.C. § 21(a) and 37 C.F.R. § 1.6(e)" on September 21, 2001, which sets forth that this application would have been filed on September 12, 2001 if it were not for the postal service interruption and emergency within the meaning of 35 U.S.C. § 21(a) as designated by the Director on September 13, 2001. Accordingly, Applicant respectfully requests that a filing date of September 12, 2001 be accorded to the present application.

II. Objection to Drawings

The drawings were objected to for including reference signs not mentioned in the Specification. Drawing corrections are submitted herewith. The attached two (2) replacement sheets of drawings contain the drawing corrections. Reference signs "K1.30" and "K1.31" have been deleted from Figure 1, and reference number "15" has been deleted from Figure 2. No new matter has been added. It is respectfully requested that the objection to the drawings be withdrawn.

III. Objection to the Specification

The Specification was objected to due to alleged informalities. Appropriate correction has been made as seen in the Amendments to the Specification on page 2 of this paper. It is respectfully requested that the objection to the Specification be withdrawn.

IV. Rejection of Claims 1, 2, and 5 Under 35 U.S.C. § 102(e)

Claims 1, 2, and 5 were rejected under 35 U.S.C. § 102(e) as anticipated by U.S. Patent No. 6,529,124 ("Flick"). Applicant respectfully submits that Flick does not anticipate claims 1, 2 and 5 for at least the following reasons.

Claim 1 relates to a device for one of controlling and regulating an operational sequence in a motor vehicle. Claim 1, as amended, recites that the device includes a carrier, a communications bus integrated on the carrier, a plurality of arrangements for performing one of a control and a regulation, each one of the arrangements including a processor that includes a storage unit and an input and output unit. Claim 1, as amended, further recites that the plurality of arrangements are integrated on the carrier, and the arrangements are interconnected by the communications bus. Support for the amendments to claim 1 may be found, for example, on page 2, lines 1 to 10 and lines 16 to 17 of the Specification.

Flick purportedly relates to a remote vehicle function control system. Flick states that the control system 20 includes a remote function controller 25 connected to a data communications bus 26 in the vehicle 21 and that the system 20 also includes a data bus adaptor cartridge connector 30, and control circuitry 31 coupled thereto, and a data bus adaptor cartridge 40 removably coupled to the data bus adaptor cartridge connector. Flick further states that the data bus adaptor cartridge 40 is for permitting communications between the control circuitry 31 and at least one vehicle device over the data communications bus 26. See col. 5, lines 5 to 17. Flick states that the data bus adaptor cartridge 40 allows for communication between the control circuitry 31 and at least one vehicle device via the data communications bus 26 and that the data communications bus 26 is connected to the remote function controller 25. The remote function controller 25 and the data bus adapter cartridge 40 are connected via the data communications bus 26 and the data bus adaptor cartridge connector 30. Flick does not disclose, or even suggest, that the remote function controller 25 and the data bus adaptor cartridge are integrated on the same carrier. Flick does not disclose, or even suggest, a device including a plurality of arrangements for performing one of a control and a regulation such that the plurality of arrangements are integrated on a carrier. Applicant submits that Flick does not disclose, or even suggest, that a plurality of arrangements are integrated on a carrier and are interconnected to each other via a

communications bus, which is also integrated on the carrier, as recited in claim 1. Therefore, Flick does not disclose all of the limitations of claim 1.

In contrast to the present claims, Figures 1 to 3 of Flick illustrate that the remote function controller and the data bus adapter cartridge are connected via connector devices 30, 46 so that the adapter cartridge 40 is removably coupled. Col. 5, lines 11 to 17. Thus, the remote function controller and the data bus adapter cartridge are not integrated on a carrier. Furthermore, Flick does not describe a data bus integrated on a carrier. Rather, the data bus is external to the housing shell 38a. Moreover, the housing shells 38a, 38b are dedicated only to the remote function controller 25 as illustrated in Figures 2 to 4. That is, the housing shells 38a, 38b are not dedicated to the data bus adapter cartridge 40, which is only connected via connector elements 30, 46 and is therefore not a part of the housing or carrier of the remote function controller. In the remote function controller, there is shown only one CPU and no plurality of arrangements with a plurality of CPUs. Thus, it is respectfully submitted that Flick does not disclose, or even suggest, all of the limitations of amended claim 1 for these additional reasons.

To anticipate a claim, each and every element as set forth in the claim must be found in a single prior art reference. Verdegaal Bros. v. Union Oil Co. of Calif., 814 F.2d 628, 631, 2 U.S.P.Q.2d 1051, 1053 (Fed. Cir. 1987). Furthermore, “[t]he identical invention must be shown in as complete detail as is contained in the . . . claim.” Richardson v. Suzuki Motor Co., 868 F.2d 1226, 1236, 9 U.S.P.Q.2d 1913, 1920 (Fed. Cir. 1989). That is, the prior art must describe the elements arranged as required by the claims. In re Bond, 910 F.2d 831, 15 U.S.P.Q.2d 1566 (Fed. Cir. 1990). As more fully set forth above, it is respectfully submitted that Flick does not disclose, or even suggest, that a plurality of arrangements integrated on a carrier and are interconnected to each other via a communications bus integrated on the carrier, as recited in amended claim 1. It is therefore respectfully submitted that Flick does not anticipate amended claim 1.

As for claims 2 and 5, which depend from claim 1 and therefore include all of the limitations of claim 1, Applicant respectfully submits that Flick does not anticipate these dependent claims for at least the same reasons given above in support of the patentability of claim 1.

V. Rejection of Claim 3 Under 35 U.S.C. § 103(a)

Claim 3 was rejected under 35 U.S.C. § 103(a) as unpatentable over the combination of Flick and U.S. Patent No. 4,910,658 ("Dudash et al."). Applicant respectfully submits that this rejection should be withdrawn for at least the following reasons.

Claim 3 depends from claim 1 and therefore includes all of the limitations of claim 1. As more fully set forth above, Flick does not disclose, or even suggest, a communications bus integrated on a carrier, a plurality of arrangements for performing one of control and regulation integrated on the carrier or that the arrangements are interconnected by the communications bus. Dudash et al. are not relied upon for disclosing or suggesting the limitations of claim 1 not disclosed or suggested by Flick. Indeed, it is respectfully submitted that Dudash et al. do not disclose, or even suggest, the limitations of claim 1 not disclosed or suggested by Flick. It is therefore respectfully submitted that the combination of Flick and Dudash et al. does not render unpatentable claim 3, which depends from claim 1.

VI. Rejection of Claim 4 Under 35 U.S.C. § 103(a)

Claim 4 was rejected under 35 U.S.C. § 103(a) as unpatentable over the combination of Flick and U.S. Patent No. 6,338,010 ("Sparks et al."). Applicant respectfully submit that this rejection should be withdrawn for at least the following reasons.

Claim 4 depends from claim 1 and therefore includes all of the limitations of claim 1. As more fully set forth above, Flick does not disclose, or even suggest, a communications bus integrated on a carrier, a plurality of arrangements for performing one of control and regulation integrated on the carrier or that the arrangements are interconnected by the communications bus. Sparks et al. are not relied upon for disclosing or suggesting the limitations of claim 1 not disclosed or suggested by Flick. Indeed, it is respectfully submitted that Sparks et al. do not disclose, or even suggest, the limitations of claim 1 not disclosed or suggested by Flick. It is therefore respectfully submitted that the combination of Flick and Sparks et al. does not render unpatentable claim 4, which depends from claim 1.

VII. New Claims 6 to 15

New claims 6 to 15 have been added herein. It is respectfully submitted that new claims 6 to 15 do not add any new matter and are fully supported by the present application, including the Specification. Since claims 6 to 15 depend from claim 1, it is respectfully submitted that claims 6 to 15 are patentable over the references relied upon for at least the same reasons given above in support of the patentability of claim 1.

VIII. Conclusion

It is therefore respectfully submitted that all of the presently pending claims are allowable. All issues raised by the Examiner having been addressed, an early and favorable action on the merits is earnestly solicited.

Respectfully submitted,

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